

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION

CYNTHIA K. HAYNES (a/k/a Cynthia K.)	
Randolph), individually and under the Missouri)	
Wrongful Death Statute)	
)	
Plaintiff,)	
)	
vs.)	Case No: 1:21-CV-00160-SNL
)	
JENNIFER WILLIAMS, individually, et al.)	
)	
Defendants.)	

**CERTAIN DEFENDANTS' CONSENTED MOTION FOR ADDITIONAL TIME
TO ANSWER TO THE AMENDED COMPLAINT**

Come Now Defendants, Jennifer Williams, individually, and Jennifer Williams, d/b/a Williams Law (collectively "Williams Defendants"), and Spain Miller, Galloway & Lee, LLC (collectively, Spain, Miller"), by and through undersigned counsel, and for their Consented Motion for Additional Time to File an Answer to Plaintiff's Amended Complaint, up through and including June 29, 2022, state:

1. On November 12, 2021, Plaintiff filed her Amended Complaint.
2. The Amended Complaint is seventy (70) pages long and includes two hundred-sixty-seven (267) paragraphs. It states claims against Defendants for wrongful death in connection with their conduct during a domestic litigation case.
3. On January 18, 2022, Defendants, having received additional time from the Court to respond to the Complaint, each filed motions to dismiss the Amended Complaint.
4. On June 08, 2022, the Court entered its Memorandum and Order ruling on each of the Defendants' separate motions to dismiss the Amended Complaint.

5. In its Memorandum and Order, the Court ordered that the Williams Defendants' Motion to Dismiss Counts I-IV of the Amended Complaint was granted as to Counts II, III and IV; and was denied as to Count I.

6. Similarly, in its Memorandum and Order, the Court ordered that Spain, Miller's Motion to Dismiss Counts I-V of the Amended Complaint was granted as to Counts II, III, IV and V, and denied as to Count I.

7. Therefore, in accordance with Fed. R. Civ. P. 12(a)(4)(A), Defendants' response to the Amended Complaint is scheduled to due on or before June 22, 2022, fourteen (14) days after the Court's Memorandum and Order was entered. Defendants respectfully state that additional is necessary to answer the Amended Complaint.

8. Defendants' request for additional time is not done to prejudice any of the parties to this cause of action or to cause undue delay in these proceedings as there is no trial date or pending deadlines.

9. On June 20, 2022, Defendants received consent from Plaintiff's counsel via email for the additional time, up to June 29, 2022 to file an answer to the Amended Complaint.

WHEREFORE, Defendants, Jennifer Williams, individually, and Jennifer Williams, d/b/a Williams Law and Spain Miller, Galloway & Lee, LLC respectfully request that this Court enter an Order extending the deadline for them to file an Answer to the Amended Complaint, up through and including June 29, 2022, and for such other relief as the Court deems necessary under the circumstances.

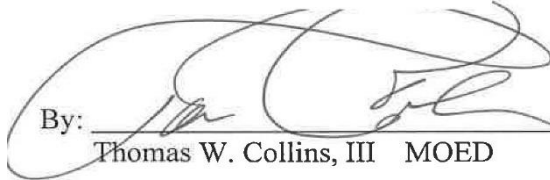
Respectfully submitted,

ROBERTS PERRYMAN, P.C.

By: /s/ Susan M. Dimond
Richard C. Wuestling, #30773MO
Susan M. Dimond, #57434MO
Dustin L. Goldberger, #70080MO
1034 S. Brentwood, Suite 2100
St. Louis, Missouri 63117
Phone: (314) 421-1850
Fax: (314) 421-4346
rwuestling@robertsperryman.com
sdimond@robertsperryman.com
dgoldberger@robertsperryman.com

Attorneys for Defendants Jennifer Williams and
Jennifer Williams d/b/a Williams Law

BLANTON, NICKELL, COLLINS,
DOUGLAS & HANSCHEN, L.L.C.
219 South Kingshighway Post Office Box 805
Sikeston, Missouri 63801
PHONE (573) 471-1000 FAX (573) 471-1012
EMAIL: tcollins@blantonlaw.com

By: 
Thomas W. Collins, III MOED 46295MO

*Attorneys for Spain, Miller, Galloway & Lee, LLC
(by consent)*

CERTIFICATE OF SERVICE

I hereby certify that on June 21, 2022, the foregoing was electronically filed with the Clerk of the Court using CM/ECF electronic filing system which will send notification of such filing to the following and email to all counsel of record:

Laurence D. Mass [laurencedmass@att.net]

Evita Tolu [evitatolu@outlook.com]

Attorneys for Plaintiff

/s/ Susan M. Dimond